UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

v.) Viol	ation:
(1) KENJI DRA Y I ON, a/k/a "Bigs," (2) WINSTON MCGHEE, a/k/a "Pooh," (3) HASSAN MONROE, a/k/a "Snack," (4) DEREK HART, a/k/a "Bro," (5) ERIC DAVIS, a/k/a "Bags," (6) MAURICE COATES, a/k/a "Mo." Poss (21 U	nt One: Conspiracy to Distribute and to sess with Intent to Distribute Cocaine and aine Base U.S.C. § 846) Seiture Allegation: U.S.C. § 853)

Defendants

COUNT ONE

INDICTMENT

Conspiracy to Distribute and to Possess with Intent to Distribute Cocaine and Cocaine Base (21 U.S.C. § 846)

The Grand Jury charges:

Between in or about June 2019 and June 2020, in Boston and Randolph, in the District of Massachusetts, and elsewhere, the defendants,

- (1) KENJI DRAYTON, a/k/a "Bigs,"
- (2) WINSTON MCGHEE, a/k/a "Pooh,"
- (3) HASSAN MONROE, a/k/a "Snack,"
 - (4) DEREK HART, a/k/a "Bro,"

- (5) ERIC DAVIS, a/k/a "Bags,"
- (6) MAURICE COATES, a/k/a "Mo,"
 - (7) DERRICK HOBSON,
 - (8) ANDRE ECHEVARRIA,
 - (9) ANTONE JEREMIAH,
 - (10) MARTIN ANGOMAS,
 - (11) MICHAEL STOKES,
 - (12) MICHAEL TOUSSAINT,
 - (13) KAREEM CHAPLIN,
 - (14) TATIANA MORRISSEY,
 - (15) RUSSELL HANKERSON,
 - (16) JARMINA KALLON,
 - (17) RENARDO WILLIAMS, and
 - (18) TARIK MUHAMMAD,

conspired with each other and with other persons known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

<u>DRUG FORFEITURE ALLEGATION</u> (21 U.S.C. § 853)

The Grand Jury further finds:

Upon conviction of the offense in violation of Title 21, United States Code,
 Section 846, set forth in Count One, the defendants,

- (1) KENJI DRAYTON, a/k/a "Bigs,"
- (2) WINSTON MCGHEE, a/k/a "Pooh,"
- (3) HASSAN MONROE, a/k/a "Snack,"
 - (4) DEREK HART, a/k/a "Bro,"
 - (5) ERIC DAVIS, a/k/a "Bags,"
- (6) MAURICE COATES, a/k/a "Mo,"
 - (7) DERRICK HOBSON,
 - (8) ANDRE ECHEVARRIA,
 - (9) ANTONE JEREMIAH,
 - (10) MARTIN ANGOMAS,
 - (11) MICHAEL STOKES,
 - (12) MICHAEL TOUSSAINT,
 - (13) KAREEM CHAPLIN,
 - (14) TATIANA MORRISSEY,
 - (15) RUSSELL HANKERSON,
 - (16) JARMINA KALLON,
 - (17) RENARDO WILLIAMS, and
 - (18) TARIK MUHAMMAD,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

- 2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant -
 - a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

TIMOTHY E. MORAN

ASSISTANT UNITED STATES ATTORNEYS

DISTRICT OF MASSACHUSETTS

District of Massachusetts: JULY 2, 2020
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo

DEPUTY CLERK

at 4:11 PM